

6

1022-491

3/13/2002

Page 185

Net Contents: ☐ 1 Quart ☐ One Gallon ☐ Five Gallon

Logo:

PQ-15 R•T•U
Clear Wood Preservative

INTERIOR OR EXTERIOR

For Above-Ground Use Only

**WATER REPELLENT - STOPS ROT - RETARDS INSECT ATTACK -
STABILIZES WOOD, INCLUDING PRESSURE -TREATED FROM WARPING
AND SWELLING - PAINTABLE AND STAINABLE -IDEAL UNDERSEAL FOR
PAINT AND SOLID COLOR STAIN - IMPROVES PAINT ADHESION**

Ingredient Statement

Active Ingredient:

Copper 8-quinolinolate 0.25%

Inert Ingredients: 99.75%

Total: 100.00%

This product contains Petroleum Distillates.

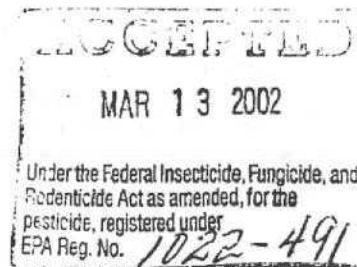
EPA Reg. No. 1022-491

EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Precautionary Statements



IBC MANUFACTURING COMPANY
416 East Brooks Road - P.O. Box 9158
Memphis, TN 38109

PRECAUTIONARY STATEMENTS**Hazards to Humans and Domestic Animals****CAUTION**

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Do not take internally. Avoid breathing of vapors. Use only in a well ventilated area. Vapors may cause injury if adequate ventilation is not insured. Wash thoroughly with soap and water after handling. Close container after each use. Keep preservative and freshly treated wood away from flame, foodstuffs and plants. Do not use this product in any confined area where vapors may concentrate and cause injury to plant or animal life.

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none">• Call Poison Control Center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the Poison Control Center or doctor
IF IN EYES	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a Poison Control Center or doctor for treatment advice.

HOT LINE NUMBER

In case of emergency, for additional information, call Chemtrec toll free at 1-800-424-9300)

Have the product container or label with you when calling
a Poison Control Center or doctor or going for treatment

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.
Contains petroleum distillates.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

RECOMMENDED USES

This water-repellent wood preservative is a ready-to-use solution for unfinished wood and wood products...millwork, fences, siding, decks, shingles, outdoor furniture, structural lumber, baseboards, sub-flooring, framing, and attic support beams. Apply by spraying, brushing, soaking, pressure treating or dipping. When spraying, use a coarse wet spray to minimize over spraying. All surfaces must be bare for the preservative to penetrate. For below grade, use Cunapso-1 for lasting protection.

CONTROLS ROT-STAIN MOLD: Contains copper -8-quinolinolate which controls rot-producing fungi on exterior, above-ground wood. Use before painting on new wood to give penetrating protection to wood fibers not normally reached by surface coatings.

INHIBITS ATTACK BY TERMITES: Termites can seriously damage wood used in building construction. This product provides penetrating protection through soaking, brush or flood spray application.

CONTROLS WARPING AND SWELLING: Under ordinary conditions of exposure, wood to which this preservative has been applied will not pick up noticeable amounts of moisture. Thus, wood so treated has dimensional stability and the possibility of warping, swelling, or shrinking in service is greatly reduced. Excellent for all wood types including pressure treated.

PAINTABLE: An excellent underseal to provide moisture barrier for paint protection. May be painted with all oil base paints and latex type paints. If topcoat is not applied over this Clear Wood Preservative, the wood surface will be allowed to weather naturally to a silvery gray color.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its label.

Important: Do not open can without reading instructions.

STIR THOROUGHLY BEFORE USING

ATTENTION: Surfaces may become slippery when wet. Use caution when walking on surface when moisture is present. Apply in sections so wet material does not have to be walked on during application.

PREPARATION:

Clean and hose off all dirt, grease and oil with mild detergent. Scrub well to remove deposits. Avoid high pressure cleaning which may harm wood; remove mildew with an EPA registered mildew stain remover or with one part bleach and three parts water. For previously painted, stained or clear sealed wood, strip entire surface by sanding or with a chemical stripper to the bare wood. For deteriorated latex or oil-based finishes, use a deck finish remover.

It is recommended that a dust mask, eye and apparel protection be worn when using a sander. Before product application, clean with a brightener /cleaner/conditioner to open the wood grain and rejuvenate the natural color of the wood. Bare wood surfaces must be completely dry before applying this product. All wood cutting should be completed before product application. Wood must be clean, dry and free from previous finishes. When applying, avoid grass, scrubs, trees and other plant life. When thoroughly dry, treated wood is secure for use with plant life.

APPLICATION AND COVERAGE:

Use in a well-ventilated area. Wear a NIOSH/MSHA approved mist/vapor respirator when spraying or for continued or prolonged use, or for frequent use of this product.

Apply by spraying, brushing, rolling, soaking, pressure treating or dipping. Pressure treating or extended soaking is the most effective application method where deep penetration and high absorption are needed. A soaking period of five minutes per inch of wood thickness is recommended.

Joints and exposed end grains of wood are more absorbent than flat or edge grain surfaces. Coverage varies by species and condition of wood. 150 to 200 sq. ft. per gallon for spray, brush and rolling application can be expected and five to ten gallons per thousand board feet for soaking, dipping and pressure treating.

DRY TIME:

All Clear Wood Preservative to dry a minimum of 48 hours prior to topcoating with an oil-based primer, solid color stain or paint. Allow up to 30 days of drying and weathering prior to topcoating with a latex-based primer, solid color stain or paint.

CLEAN UP:

Clean brushes and other tools with paint thinner or mineral spirits. Remove drips and spatters while product is still wet. If dried, use paint remover.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

DO NOT STORE UNUSED PRODUCT INSIDE THE HOME. Rags, steel wool and any other waste product may **spontaneously catch fire** if improperly discarded or stored. To avoid a spontaneous combustion fire, immediately after use, place rags, steel wool or waste in a sealed, water-filled, metal container.

Container Disposal: DO NOT reuse empty container. Place the lid securely on empty container and discard in trash. If the container(s) cannot be disposed of according to label instructions, consult federal, state or local disposal authorities for alternate procedures.

WARRANTY AND LIMITATION OF DAMAGES

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller this product conformed to its chemical description and that it was reasonably fit for the purposes stated on the product label when used both in accordance with the Direction for Use appearing on the product label and under normal conditions of use. Buyers and users of this product assume the risk of all loss or damage from use or handling of this product that results from their failure to read and comply with the Directions for Use of this product which appear on the product label. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO. Unless expressly prohibited by state law, the liability of seller for any breach of warranty shall not exceed the purchase price of the product as to which a claim is made.



Note: This picture is required by California to be a part of a product label if the product is to be sold in a 5 gallon open head pail.

File: IBC/ISK Labels / IBC Labels / copper-8-quinolinolate / PQ-15 RTU Label Amds. / 5-Gal

1022-491

02-12-2004

47

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY


 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Washington, D.C. 20460

 OFFICE OF
 PREVENTION, PESTICIDES
 AND TOXIC SUBSTANCES

February 12, 2004

 Gail Early
 Registrations Representative
 IBC Manufacturing Company
 416 East Brooks Road
 Memphis, TN 38109

 Subject: PQ-15 RTU
 EPA Registration No. 1022-491
 Application Date: January 13, 2004
 EPA Received Date: January 15, 2004

Dear Ms. Early:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA 3(c)9.

Proposed Notification

- Updating Disposal Instructions

General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable. A copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,

 Adam Heyward
 Product Manager 34
 Regulatory Management Branch II
 Antimicrobials Division (7510 C)

		CONCURRENCES					
SYMBOL	7810C						
SURNAME	Heyward						
DATE	2-12-04						



Read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0080. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1022-491	2. EPA Product Manager Heyward	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PQ-15 RTU	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) IBC Manufacturing Company 416 East Brooks Road Memphis, TN 38109 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Updated disposal instructions. Notification of label change relative to PR Notice 2001-6. This notification is consistent with the guidance in PR Notice 2001-6 and the requirements of EPA's regulations at 40 CFR 156.10 and 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the guidance of PR Notice 2001-6 and the requirements of 40 CFR 156.10 and 40 CFR 152.46, this product may be in violation of FIFRA, and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Gail Early		Title Registrations Representative		Telephone No. (Include Area Code)	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment, or both under applicable law.				6. Date Application Received (Stamped)	
2. Signature <i>Gail Early</i>		3. Title Registrations Representative			
4. Typed Name Gail Early		5. Date Jan 13, 2004			

Net Contents: ☐ 1 Quart ☐ One Gallon ☐ Five Gallon

Logo:

PQ-15 R•T•U
Clear Wood Preservative

NOTIFICATION
Date Reviewed: 2-12-04
Reviewed By: S. Grey

INTERIOR OR EXTERIOR

For Above-Ground Use Only

**WATER REPELLENT - STOPS ROT - RETARDS INSECT ATTACK -
STABILIZES WOOD, INCLUDING PRESSURE -TREATED FROM WARPING
AND SWELLING - PAINTABLE AND STAINABLE -IDEAL UNDERSEAL FOR
PAINT AND SOLID COLOR STAIN - IMPROVES PAINT ADHESION**

Ingredient Statement

Active Ingredient:

Copper 8-quinolinolate 0.25%

Inert Ingredients: 99.75%

Total: 100.00%

This product contains Petroleum Distillates.

EPA Reg. No. 1022-491

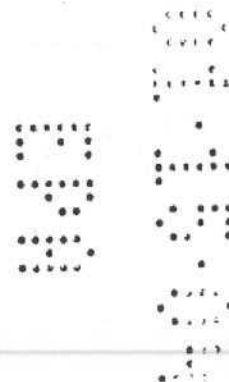
EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Precautionary Statements

IBC MANUFACTURING COMPANY
416 East Brooks Road - P.O. Box 9158
Memphis, TN 38109



PRECAUTIONARY STATEMENTS**Hazards to Humans and Domestic Animals****CAUTION**

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Do not take internally. Avoid breathing of vapors. Use only in a well ventilated area. Vapors may cause injury if adequate ventilation is not insured. Wash thoroughly with soap and water after handling. Close container after each use. Keep preservative and freshly treated wood away from flame, foodstuffs and plants. Do not use this product in any confined area where vapors may concentrate and cause injury to plant or animal life.

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none">• Call Poison Control Center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the Poison Control Center or doctor
IF IN EYES	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a Poison Control Center or doctor for treatment advice.

HOT LINE NUMBER

In case of emergency, for additional information, call Chemtrec toll free at 1-800-424-9300)

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NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.
Contains petroleum distillates.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL AND CHEMICAL HAZARDS

COMBUSTIBLE. Do not use or store near heat or open flame.

RECOMMENDED USES

This water-repellent wood preservative is a ready-to-use solution for unfinished wood and wood products...millwork, fences, siding, decks, shingles, outdoor furniture, structural lumber, baseboards, sub-flooring, framing, and attic support beams. Apply by spraying, brushing, soaking, pressure treating or dipping. When spraying, use a coarse wet spray to minimize over-spraying. All surfaces must be bare for the preservative to penetrate. For below grade, use Cunapso-1 for lasting protection.

CONTROLS ROT-STAIN MOLD: Contains copper -8-quinolinolate which controls rot-producing fungi on exterior, above-ground wood. Use before painting on new wood to give penetrating protection to wood fibers not normally reached by surface coatings.

INHIBITS ATTACK BY TERMITES: Termites can seriously damage wood used in building construction. This product provides penetrating protection through soaking, brush or flood spray application.

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PAINTABLE: An excellent underseal to provide moisture barrier for paint protection. May be painted with all oil base paints and latex type paints. If topcoat is not applied over this Clear Wood Preservative, the wood surface will be allowed to weather naturally to a silvery gray color.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its label.

Important: Do not open can without reading instructions.

STIR THOROUGHLY BEFORE USING

ATTENTION: Surfaces may become slippery when wet. Use caution when walking on surface when moisture is present. Apply in sections so wet material does not have to be walked on during application.

PREPARATION:

Clean and hose off all dirt, grease and oil with mild detergent. Scrub well to remove deposits. Avoid high pressure cleaning which may harm wood; remove mildew with an EPA registered mildew stain remover or with one part bleach and three parts water. For previously painted, stained or clear sealed wood, strip entire surface by sanding or with a chemical stripper to the bare wood. For deteriorated latex or oil-based finishes, use a deck finish remover.

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APPLICATION AND COVERAGE:

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Apply by spraying, brushing, rolling, soaking, pressure treating or dipping. Pressure treating or extended soaking is the most effective application method where deep penetration and high absorption are needed. A soaking period of five minutes per inch of wood thickness is recommended.

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DRY TIME:

All Clear Wood Preservative to dry a minimum of 48 hours prior to topcoating with an oil-based primer, solid color stain or paint. Allow up to 30 days of drying and weathering prior to topcoating with a latex-based primer, solid color stain or paint.

CLEAN UP:

Clean brushes and other tools with paint thinner or mineral spirits. Remove drips and spatters while product is still wet. If dried, use paint remover.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

DO NOT STORE UNUSED PRODUCT INSIDE THE HOME. Rags, steel wool and any other waste product may **spontaneously catch fire** if improperly discarded or stored. To avoid a spontaneous combustion fire, immediately after use, place rags, steel wool or waste in a sealed, water-filled, metal container.

If Empty: Do not reuse this container. Place in trash or offer for recycling if available.

If Partially Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

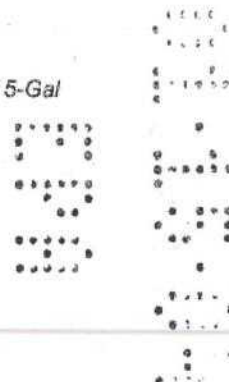
**WARRANTY
AND
LIMITATION OF DAMAGES**

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller this product conformed to its chemical description and that it was reasonably fit for the purposes stated on the product label when used both in accordance with the Direction for Use appearing on the product label and under normal conditions of use. Buyers and users of this product assume the risk of all loss or damage from use or handling of this product that results from their failure to read and comply with the Directions for Use of this product which appear on the product label. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO. Unless expressly prohibited by state law, the liability of seller for any breach of warranty shall not exceed the purchase price of the product as to which a claim is made.



Note: This picture is required by California to be a part of a product label if the product is to be sold in a 5 gallon open head pail.

File: IBC/ISK Labels / IBC Labels / copper-8-quinolinolate / PQ-15 RTU Label Amds. / 5-Gal



1022-518

12-6-2007

1/8

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

December 6, 2007

Gail Early Watson
Registrations Representative
IBC Manufacturing Co.
416 East Brooks Rd.
Memphis, TN 38109

Subject: Cunapsol
EPA Registration No.: 1022-518
Application Date: November 12, 2007
Receipt Date: November 14, 2007

Dear Ms. Watson Early,

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- Add VOC Statements from front panel to 'other statements' section.
- Remove statement 'This product does not contain creosote.'

General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me by telephone at (703) 308-6422 or email at heyward.adam@epa.gov.

Sincerely,



Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES							
SYMBOL	7510 P						
SURNAME	Grahn						
DATE	12/6/07						



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1022-518	2. EPA Product Manager Heyward	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Cunapsol-1	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) IBC Manufacturing Company 416 East Brooks Road Memphis, TN 38109 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Minor Label Changes.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information

☐ Label ☐ Container

4. Size(s) Retail Container

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product

☐ Lithograph
☐ Paper glued
☐ Stenciled
☐ Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Gail Early Watson	Title Registrations Representative	Telephone No. (Include Area Code) 901-344-5316
---------------------------	---------------------------------------	---

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.
I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.

2. Signature

Gail Early Watson

3. Title

Registrations Representative

4. Typed Name

Gail Early Watson

5. Date

11-12-07

6. Date Application Received
(Stamped)

3/8

Cunapsol-1
Wood Preservative

FOR EXTERIOR USE ONLY

NOTIFICATION
Date Reviewed: 12-5-07
Reviewed By: A. G. Graw

[Color statement(s)]
[Use statement(s)]
[Control statement(s)]
[Other statement(s)]

ACTIVE INGREDIENTS:

Copper Naphthenate	9.08%*
Inert Ingredients:	90.92%
Total:	100.00%

*Equivalent to 1% metallic copper.

Cunapsol 1 weighs approximately 8.5 lbs. per gallon.

EPA Reg. No. 1022-518 EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN
DANGER

See Back Panel for Precautionary Statements

Net Contents: 1 U.S. Quart (.9 Liters)
1 U.S. Gallon (3.785 Liters)
5 U.S. Gallons (18.925 Liters)

IBC Manufacturing Company
416 East Brooks Road
Memphis, Tennessee 38109
901-344-5350

FIRST AID

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15–20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a Poison Control Center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air. If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a Poison Control Center or doctor for treatment advice.

In case of emergency, call Chemtrec at 1-800-424-9300.

Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes irreversible eye damage. Do not get in eyes, on skin or on clothing. Wear goggles or face shield. Harmful if inhaled. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. DO NOT breathe vapors or mist during brush, roll, spray and dip applications. Wear an NIOSH/MHSA-approved mist/vapor respirator when spraying for continued or prolonged use of this product or for frequent use of the product. In case of medical questions, emergencies or accidents involving this product, call Chemtrac at 1-800-424-9300. Application of this product may produce strong, lingering, unpleasant odor.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use only the application method specified for a particular use.

Cunapsol-1 Wood Preservative is a multi-purpose, water-based exterior wood preservative and insecticide pre-treatment for below ground, ground contact, fresh water contact and above ground applications where either pressure-treated or non-pressure-treated wood has been used. When applied as directed, Cunapsol-1 provides protection against attack from termites and other wood boring insects and decay fungi, including mildew, mold, rot and decay organisms. It also controls warping, swelling and end checking due to its anti-wicking property, which resists moisture absorption and movement from end to end. This preservative will impart a color to wood that will fade over time, but if undesirable, can be top-coated with paint or stain.

Cunapsol-1 Wood Preservative requires no dilution before use. Use as received, following label directions.

Wood treated with this preservative should not be used where it may come in contact with food, feed or potable water.

RECOMMENDED USES: Landscape timbers, railroad ties, fence posts, poles, pickets and rails, construction posts, foundation sills, steps, stairs, porches, siding, millwork, shakes, shingles, roofs, windows, window frames, doors, docks, piers, boats or other non-pressure-treated exterior wood exposed to moisture, weather or wood destroying insects. Also recommended for pressure-treated wood end cut protection, especially on decks.

5/8

Since Cunapsol-1 Wood Preservative has very low phytotoxicity, it can be used to treat wood for greenhouses, nursery flats, etc. Pretreatment only. Do not apply at sites on or near water or wetlands.

Powder post beetles which invade structural lumber are killed by application of this preservative. These insects will not attack the treated wood. Wood to be protected against subterranean termites should be treated before use in construction. Termites will not attack wood treated with this preservative.

In addition to preventing decay, blue stain, and insect attack on wood, Cunapsol-1 Wood Preservative controls warping, swelling, shrinking and end-checking caused by changes in moisture content of lumber and plywood products.

BEFORE YOU START: Make sure wood is dry and free of dust, dirt and debris. Stir or shake well before using. **IMPORTANT:** This product has a color that slowly fades with time, but can be stained or painted after 24 hours, or re-applied at any time. Always test in an inconspicuous area for color satisfaction.

APPLICATION PROCEDURES: For best results, apply when outside temperatures are between 50°F and 90°F, and when 24 hours of precipitation-free weather is expected. Apply by dip treatment, brush, roller or pump sprayer.

Below Ground, Ground or Fresh Water Contact:

Seasoned (weathered) or green (new) wood may be treated. Make certain the wood is free of bark, then immerse in Cunapsol-1 for 12 to 48 hours or until the sapwood is completely penetrated. If dipping is not possible, 2 brush coats, roller or spray applications should be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow wood to dry for 24 hours before installation.

Above Ground Contact:

The best results will be obtained if wood to be treated is immersed for 3 minutes or longer. If dipping is not possible, 2 brush coats, roller or spray applications should be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow 24 hours or longer after application of the preservative prior to installation, painting and/or staining.

COVERAGE: One gallon covers 100 – 300 sq ft (9 – 28 m²), depending upon the wood age and species, surface porosity and method of application. One quart covers 40 – 50 sq. ft. (4 – 5 m²).

CLEAN-UP: Clean tools and equipment after use with soap and water.

STORAGE AND DISPOSAL

STORAGE:

Store in a secure, well-ventilated area protected from extreme temperatures. Do not transfer to unmarked containers. Keep container closed when not in use.

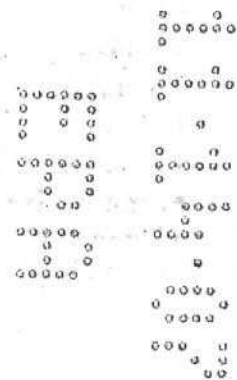
DISPOSAL:

If Empty: Do not reuse this container. Place in trash or offer for recycling if available.
If Partially Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.
Never place unused product down any indoor or outdoor drain.

6/8

WARRANTY AND LIMITATION OF DAMAGES

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller this product conformed to its chemical description and that it was reasonably fit for the purposes stated on the product label when used both in accordance with the Direction for Use appearing on the product label and under normal conditions of use. Buyers and users of this product assume the risk of all loss or damage from use or handling of this product that results from their failure to read and comply with the Directions for Use of this product which appear on the product label. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO. Unless expressly prohibited by state law, the liability of seller for any breach of warranty shall not exceed the purchase price of the product as to which a claim is made.



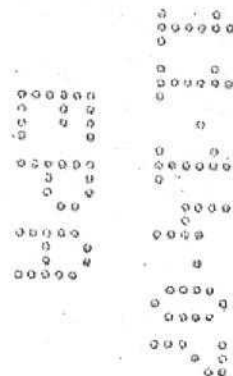
Label to include any of the following statements

(Color Statements)

- Green Wood Preservative
- Black Wood Preservative
- Brown Wood Preservative
- Cedartone Wood Preservative
- Imparts Green Color
- Imparts Black Color
- Imparts Brown Color
- Imparts Cedartone Color
- Imparts Long-Lasting, Black Color to Wood, Similar to Creosote
- Looks like Creosote
- With brown color additive
- Brown
- * • Cedar Color

(Use Statements)

- Above or Below Ground & Ground Contact
- Above or Below Ground, Ground and Water Contact
- Use above or below ground
- For wood in contact with soil and water
- Docks & Piers, Construction Posts, Fencing, and End Cuts
- End Cut Protection
- Ideal for End Cut Protection
- Landscape Ties, Fence Posts & Rails, and Construction Posts
- Construction Posts and Outdoor Decor
- Great for Small Projects
- Brush on preservative especially formulated for the coating of freshly sawn ends of pressure treated Outdoor wood.
- Cedar Shake Roof Preservative
- Ground Contact Preservative
- Decks
- Fences
- Shakes
- Shingles
- Roofs
- Posts
- Pressure-Treated Wood End Cut Protection
- Exterior
- * • For Preserving Cedar Shake Roofs



• This product is not designed for application on decks, outdoor furniture or other structures intended for seating or heavy foot traffic.

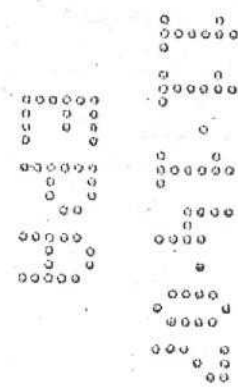
• ~~Wolmanized End Cut Solution is a brush-on preservative especially formulated~~ for the coating of freshly sawn ends of pressure-treated wood products that have been surface coated with a brown stain.

(Control Statements)

- Prolongs the life of non-pressure treated wood
- Prevents termite and other insect attack
- Protects against rot and decay
- Resists mold, mildew and stain fungi
- Anti-wicking – controls moisture damage
- Stops rot, decay and insect attack
- Protects against wood rot, warping swelling, termite damage, mildew and moisture
- Kills powder post beetles, termite attack above or below the ground
- Prevents decay, warping & swelling
- Preserves Wood
- Wood Preservative
- * • Protects Against Decay

(Other Statements)

- Paintable and Stainable
- Deep Penetrating formula
- Easy soap and water clean-up
- Water clean up
- Note: application of product on redwood and cedar will darken wood.
- Application of this product may produce strong, lingering odor
- Ready to Use
- Cunapsol Wood Preservative
- Approved for Outdoor Wood® Lifetime Warranty
- Wolmanized® Pressure-Treated Wood End Cut Solution
- Made in USA
- Printed in USA
- * • Volatile Organic Compounds <350 gm./liter.
- * • VOS (excluding water) < 0.35 kg./liter
- * • VOC Content 221 g/L (1.84 lbs/gal)



1022-518

3/10/2005

Page 1810



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 10, 2005

Gail Early
Registrations Representative
IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109

Subject: Notification Application Per PR Notice 98-10
Cunapsol-1
EPA Registration No. 1022-518
Application Dated February 10, 2005

Dear Ms. Early:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification:

- Minor label change

General Comment:

Based on a review of the material submitted, the following comments apply:

A copy of the notification has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Lisa McKelvin at (703) 308-7496.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa McKelvin".

Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)



Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1022-518	2. EPA Product Manager Heyward	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Cunapsol-1	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) IBC Manufacturing Company 416 East Brooks Road Memphis, TN 38109 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Addition of Industrial Disposal Instructions and one each additional Use, Color and Control statements. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Notification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Gail Early	Title Registrations Representative	Telephone No. (Include Area Code)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
Signature Gail Early	3. Title Registrations Representative	
4. Typed Name Gail Early	5. Date Feb. 10, 2005	

34

3 8 10

TRANSMITTAL DOCUMENT

NOTIFICATION

(Revised Storage and Disposal Statements &
Reworded Use, Control and Color Statements)

FOR

CUNAPSOL-1

(EPA Registration No. 1022-518)

February 10, 2005

Company Official:

Gail Early
Name

Gail Early
Signature

Company Name:

IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109

Company Contact:

Gail Early
Name

901/344-5316
Phone

4 7 10

IBC MANUFACTURING COMPANY

February 10, 2005

Mr. Adam Heyward, Team Leader (34)
Regulatory Management Branch II
Antimicrobials Division (7510W)
U.S. Environmental Protection Agency
Crystal Mall #2
1801 South Bell Street
Arlington, VA 22202

Re: Cunapsol-1 (EPA Reg. No. 1022-518)
Notification of Addition of Industrial Disposal Statements &
Additional Use, Control, and Color Statements

Dear Mr. Heyward:

The purpose of this submission is to notify the agency of the addition of industrial disposal statements and of three phrases added to the above master label.

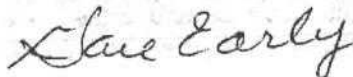
This product is sold into both the industrial and homeowner markets and should carry disposal statements for both applications. Regarding the use, color and control statements, these additions are simply restating existing claims with slightly different wording. They are as follows:

- For Preserving Cedar Shake Roofs
- Cedar Color
- Protects Against Decay

We are hopeful that this notification is acceptable. Enclosed is one copy of the label with this change indicated for your files.

If you have questions or need additional information, I can be reached at 901-344-5316 or earlyg@ibio.com.

Sincerely,



Gail Early
Registrations Representative

Enclosures

5 8 10

Cunapsol-1

Wood Preservative

FOR EXTERIOR USE ONLY

[Color statement(s)]
[Use statement(s)]
[Control statement(s)]
[Other statement(s)]

ACTIVE INGREDIENTS:

Copper Naphthenate	9.08%*
Inert Ingredients:	90.92%
Total:	100.00%

*Equivalent to 1% metallic copper.

Cunapsol 1 weighs approximately 8.5 lbs. per gallon.

EPA Reg. No. 1022-518 EPA Est. No. 1022-TN-1

Volatile Organic Compounds <350 gm./liter.
VOS (excluding water) < 0.35 kg./liter

KEEP OUT OF REACH OF CHILDREN
DANGER
See Back Panel for Precautionary Statements

Net Contents: 1 U.S. Quart (.9 Liters)
1 U.S. Gallon (3.785 Liters)
5 U.S. Gallons (18.925 Liters)

IBC Manufacturing Company
416 East Brooks Road
Memphis, Tennessee 38109
901-344-5350

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none">▪ Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a Poison Control Center or doctor for treatment advice.
In case of emergency, call Chemtrec at 1-800-424-9300.	
Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.	

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

Causes irreversible eye damage. Do not get in eyes, on skin or on clothing. Wear goggles or face shield. Harmful if inhaled. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before re-use. DO NOT breathe vapors or mist during brush, roll, spray and dip applications. Wear an NIOSH/MHSA-approved mist/vapor respirator when spraying for continued or prolonged use of this product or for frequent use of the product. In case of medical questions, emergencies or accidents involving this product, call Chemtrec at 1-800-424-9300. Application of this product may produce strong, lingering, unpleasant odor.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use only the application method specified for a particular use.

Cunapsol-1 Wood Preservative is a multi-purpose, water-based exterior wood preservative and insecticide pre-treatment for below ground, ground contact, fresh water contact and above ground applications where either pressure-treated or non-pressure-treated wood has been used. When applied as directed, Cunapsol-1 provides protection against attack from termites and other wood boring insects and decay fungi, including mildew, mold, rot and decay organisms. It also controls warping, swelling and end checking due to its anti-wicking property, which resists moisture absorption and movement from end to end. This preservative will impart a color to wood that will fade over time, but if undesirable, can be top-coated with paint or stain.

Cunapsol-1 Wood Preservative requires no dilution before use. Use as received, following label directions.

Wood treated with this preservative should not be used where it may come in contact with food, feed or potable water.

RECOMMENDED USES: Landscape timbers, railroad ties, fence posts, poles, pickets and rails, construction posts, foundation sills, steps, stairs, porches, siding, millwork, shakes, shingles, roofs, windows, window frames, doors, docks, piers, boats or other non-pressure-treated exterior wood exposed to moisture, weather or wood destroying insects. Also recommended for pressure-treated wood end cut protection, especially on decks.

Since Cunapsol-1 Wood Preservative has very low phytotoxicity, it can be used to treat wood for greenhouses, nursery flats, etc. Pretreatment only. Do not apply at sites on or near water or wetlands.

Powder post beetles which invade structural lumber are killed by application of this preservative. These insects will not attack the treated wood. Wood to be protected against subterranean termites should be treated before use in construction. Termites will not attack wood treated with this preservative.

In addition to preventing decay, blue stain, and insect attack on wood, Cunapsol-1 Wood Preservative controls warping, swelling, shrinking and end-checking caused by changes in moisture content of lumber and plywood products.

BEFORE YOU START: Make sure wood is dry and free of dust, dirt and debris. Stir or shake well before using. **IMPORTANT:** This product has a color that slowly fades with time, but can be stained or painted after 24 hours, or re-applied at any time. Always test in an inconspicuous area for color satisfaction.

APPLICATION PROCEDURES: For best results, apply when outside temperatures are between 50°F and 90°F, and when 24 hours of precipitation-free weather is expected. Apply by dip treatment, brush, roller or pump sprayer.

Below Ground, Ground or Fresh Water Contact:

Seasoned (weathered) or green (new) wood may be treated. Make certain the wood is free of bark, then immerse in Cunapsol-1 for 12 to 48 hours or until the sapwood is completely penetrated. If dipping is not possible, 2 brush coats, roller or spray applications should be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow wood to dry for 24 hours before installation.

Above Ground Contact:

The best results will be obtained if wood to be treated is immersed for 3 minutes or longer. If dipping is not possible, 2 brush coats, roller or spray applications should be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow 24 hours or longer after application of the preservative prior to installation, painting and/or staining.

COVERAGE: One gallon covers 100 – 300 sq ft (9 – 28 m²), depending upon the wood age and species, surface porosity and method of application. One quart covers 40 – 50 sq. ft. (4 – 5 m²).

CLEAN-UP: Clean tools and equipment after use with soap and water.

8 8 10

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store in a secure, well-ventilated area protected from extreme temperatures. Do not transfer to unmarked containers. Keep container closed when not in use.

DISPOSAL – COMMERCIAL / INDUSTRIAL:

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult Federal, State or Local disposal authorities for approved alternative procedures.

DISPOSAL – RESIDENTIAL / HOMEOWNER:

If Empty: Do not reuse this container. Place in trash or offer for recycling if available.

If Partially Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY AND LIMITATION OF DAMAGES

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller this product conformed to its chemical description and that it was reasonably fit for the purposes stated on the product label when used both in accordance with the Direction for Use appearing on the product label and under normal conditions of use. Buyers and users of this product assume the risk of all loss or damage from use or handling of this product that results from their failure to read and comply with the Directions for Use of this product which appear on the product label. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO. Unless expressly prohibited by state law, the liability of seller for any breach of warranty shall not exceed the purchase price of the product as to which a claim is made.

Label to include any of the following statements

(Color Statements)

- Green Wood Preservative
- Black Wood Preservative
- Brown Wood Preservative
- Cedartone Wood Preservative
- Imparts Green Color
- Imparts Black Color
- Imparts Brown Color
- Imparts Cedartone Color
- Imparts Long-Lasting, Black Color to Wood, Similar to Creosote
- Looks like Creosote
- With brown color additive
- Brown
- * • Cedar Color ←

(Use Statements)

- Above or Below Ground & Ground Contact
- Above or Below Ground, Ground and Water Contact
- Use above or below ground
- For wood in contact with soil and water
- Docks & Piers, Construction Posts, Fencing, and End Cuts
- End Cut Protection
- Ideal for End Cut Protection
- Landscape Ties, Fence Posts & Rails, and Construction Posts
- Construction Posts and Outdoor Decor
- Great for Small Projects
- Brush on preservative especially formulated for the coating of freshly sawn ends of pressure treated Outdoor wood.
- * • For Preserving Cedar Shake Roofs ←
- Cedar Shake Roof Preservative
- Ground Contact Preservative
- Decks
- Fences
- Shakes
- Shingles
- Roofs
- Posts
- Pressure-Treated Wood End Cut Protection
- Exterior
- This product is not designed for application on decks, outdoor furniture or other structures intended for seating or heavy foot traffic.

(Control Statements)

- Prolongs the life of non-pressure treated wood
- Prevents termite and other insect attack
- * • Protects against decay ←
- Protects against rot and decay
- Resists mold, mildew and stain fungi
- Anti-wicking – controls moisture damage
- Stops rot, decay and insect attack
- Protects against wood rot, warping swelling, termite damage, mildew and moisture
- Kills powder post beetles, termite attack above or below the ground
- Prevents decay, warping & swelling
- Preserves Wood
- Wood Preservative

(Other Statements)

- Paintable and Stainable
- Deep Penetrating formula
- Easy soap and water clean-up
- Water clean up
- Note: application of product on redwood and cedar will darken wood.
- Application of this product may produce strong, lingering odor
- Ready to Use
- Cunapsol Wood Preservative
- Approved for Outdoor Wood® Lifetime Warranty
- Wolmanized® Pressure-Treated Wood End Cut Solution
- Made in USA
- Printed in USA
- This product does not contain creosote.

1/20/2004

1/8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 20, 2004

Gail Early
Registrations Representative
IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109

Subject: Cunapsol - 1
EPA Registration No. 1022-518
Application Date: November 20, 2003
EPA Received Date: December 22 2003

Dear Ms. Early:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- Revised Disposal Instructions per PR Notice 2001-6

Label Comments

Please note that the Storage and Disposal Instructions submitted on your product label is acceptable for containers one gallon or less in size. Since this product is sold in containers greater than one gallon, upon submission of any future product labels, via amendment, you must include the following statements:

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

SYMBOL		CONCURRENCES					
SURNAME	75/01						
DATE	1-20-04						

PESTICIDE STORAGE: Store in a secure, well-ventilated area protected from extreme temperatures. Do not transfer to unmarked containers. Keep container closed when not in use.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

General Comments

Based on a review of the material submitted, the following comments apply:

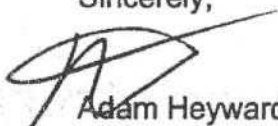
The notification application is acceptable. A copy has been inserted in your file for future reference.

Other Comments

Note for future filing of notifications and amendments, the certification statement must read as stated in section VI(1) of PR Notice 98-10.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)



3/8

Cunapsol-1
Wood Preservative

FOR EXTERIOR USE ONLY

[Color statement(s)]
[Use statement(s)]
[Control statement(s)]
[Other statement(s)]

ACTIVE INGREDIENTS:

Copper Naphthenate	9.08%*
Inert Ingredients:	<u>90.92%</u>
Total:	100.00%

NOTIFICATION
Date Reviewed: 1-20-04
Reviewed By: Gray

*Equivalent to 1% metallic copper.

Cunapsol 1 weighs approximately 8.5 lbs. per gallon.

EPA Reg. No. 1022-518 EPA Est. No. 1022-TN-1

Volatile Organic Compounds <350 gm./liter.
VOS (excluding water) < 0.35 kg./liter

KEEP OUT OF REACH OF CHILDREN
DANGER
See Back Panel for Precautionary Statements

Net Contents: 1 U.S. Quart (.9 Liters)
1 U.S. Gallon (3.785 Liters)
5 U.S. Gallons (18.925 Liters)

IBC Manufacturing Company
416 East Brooks Road
Memphis, Tennessee 38109
901-344-5350

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.▪ Call a Poison Control Center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none">▪ Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.▪ Call a Poison Control Center or doctor for treatment advice.
In case of emergency, call Chemtrec at 1-800-424-9300.	
Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.	

4/8

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

Causes irreversible eye damage. Do not get in eyes, on skin or on clothing. Wear goggles or face shield. Harmful if inhaled. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before re-use. DO NOT breathe vapors or mist during brush, roll, spray and dip applications. Wear an NIOSH/MHSA-approved mist/vapor respirator when spraying for continued or prolonged use of this product or for frequent use of the product. In case of medical questions, emergencies or accidents involving this product, call Chemtrec at 1-800-424-9300. Application of this product may produce strong, lingering, unpleasant odor.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use only the application method specified for a particular use.

Cunapsol-1 Wood Preservative is a multi-purpose, water-based exterior wood preservative and insecticide pre-treatment for below ground, ground contact, fresh water contact and above ground applications where either pressure-treated or non-pressure-treated wood has been used. When applied as directed, Cunapsol-1 provides protection against attack from termites and other wood boring insects and decay fungi, including mildew, mold, rot and decay organisms. It also controls warping, swelling and end checking due to its anti-wicking property, which resists moisture absorption and movement from end to end. This preservative will impart a color to wood that will fade over time, but if undesirable, can be top-coated with paint or stain.

Cunapsol-1 Wood Preservative requires no dilution before use. Use as received, following label directions.

Wood treated with this preservative should not be used where it may come in contact with food, feed or potable water.

RECOMMENDED USES: Landscape timbers, railroad ties, fence posts, poles, pickets and rails, construction posts, foundation sills, steps, stairs, porches, siding, millwork, shakes, shingles, roofs, windows, window frames, doors, docks, piers, boats or other non-pressure-treated exterior wood exposed to moisture, weather or wood destroying insects. Also recommended for pressure-treated wood end cut protection, especially on decks.

5/8

Since Cunapsol-1 Wood Preservative has very low phytotoxicity, it can be used to treat wood for greenhouses, nursery flats, etc. Pretreatment only. Do not apply at sites on or near water or wetlands.

Powder post beetles which invade structural lumber are killed by application of this preservative. These insects will not attack the treated wood. Wood to be protected against subterranean termites should be treated before use in construction. Termites will not attack wood treated with this preservative.

In addition to preventing decay, blue stain, and insect attack on wood, Cunapsol-1 Wood Preservative controls warping, swelling, shrinking and end-checking caused by changes in moisture content of lumber and plywood products.

BEFORE YOU START: Make sure wood is dry and free of dust, dirt and debris. Stir or shake well before using. **IMPORTANT:** This product has a color that slowly fades with time, but can be stained or painted after 24 hours, or re-applied at any time. Always test in an inconspicuous area for color satisfaction.

APPLICATION PROCEDURES: For best results, apply when outside temperatures are between 50°F and 90°F, and when 24 hours of precipitation-free weather is expected. Apply by dip treatment, brush, roller or pump sprayer.

Below Ground, Ground or Fresh Water Contact:

Seasoned (weathered) or green (new) wood may be treated. Make certain the wood is free of bark, then immerse in Cunapsol-1 for 12 to 48 hours or until the sapwood is completely penetrated. If dipping is not possible, 2 brush coats, roller or spray applications should be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow wood to dry for 24 hours before installation.

Above Ground Contact:

The best results will be obtained if wood to be treated is immersed for 3 minutes or longer. If dipping is not possible, 2 brush coats, roller or spray applications should be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow 24 hours or longer after application of the preservative prior to installation, painting and/or staining.

COVERAGE: One gallon covers 100 – 300 sq ft (9 – 28 m²), depending upon the wood age and species, surface porosity and method of application. One quart covers 40 – 50 sq. ft. (4 – 5 m²).

CLEAN-UP: Clean tools and equipment after use with soap and water.

STORAGE AND DISPOSAL

STORAGE:

Store in a secure, well-ventilated area protected from extreme temperatures. Do not transfer to unmarked containers. Keep container closed when not in use.

DISPOSAL:

- If Empty: Do not reuse this container. Place in trash or offer for recycling if available.
- If Partially Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.
- Never place unused product down any indoor or outdoor drain.

6/8

**WARRANTY AND
LIMITATION OF DAMAGES**

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller this product conformed to its chemical description and that it was reasonably fit for the purposes stated on the product label when used both in accordance with the Direction for Use appearing on the product label and under normal conditions of use. Buyers and users of this product assume the risk of all loss or damage from use or handling of this product that results from their failure to read and comply with the Directions for Use of this product which appear on the product label. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO. Unless expressly prohibited by state law, the liability of seller for any breach of warranty shall not exceed the purchase price of the product as to which a claim is made.

Label to include any of the following statements

(Color Statements)

- Green Wood Preservative
- Black Wood Preservative
- Brown Wood Preservative
- Cedartone Wood Preservative
- Imparts Green Color
- Imparts Black Color
- Imparts Brown Color
- Imparts Cedartone Color
- Imparts Long-Lasting, Black Color to Wood, Similar to Creosote
- Looks like Creosote
- With brown color additive
- Brown

(Use Statements)

- Above or Below Ground & Ground Contact
- Above or Below Ground, Ground and Water Contact
- Use above or below ground
- For wood in contact with soil and water
- Docks & Piers, Construction Posts, Fencing, and End Cuts
- End Cut Protection
- Ideal for End Cut Protection
- Landscape Ties, Fence Posts & Rails, and Construction Posts
- Construction Posts and Outdoor Decor
- Great for Small Projects
- Brush on preservative especially formulated for the coating of freshly sawn ends of pressure treated Outdoor wood.
- Cedar Shake Roof Preservative
- Ground Contact Preservative
- Decks
- Fences
- Shakes
- Shingles
- Roofs
- Posts
- Pressure-Treated Wood End Cut Protection
- Exterior
- This product is not designed for application on decks, outdoor furniture or other structures intended for seating or heavy foot traffic.

(Control Statements)

- Prolongs the life of non-pressure treated wood
- Prevents termite and other insect attack
- Protects against rot and decay
- Resists mold, mildew and stain fungi
- Anti-wicking – controls moisture damage
- Stops rot, decay and insect attack
- Protects against wood rot, warping swelling, termite damage, mildew and moisture
- Kills powder post beetles, termite attack above or below the ground
- Prevents decay, warping & swelling
- Preserves Wood
- Wood Preservative

(Other Statements)

- Paintable and Stainable
- Deep Penetrating formula
- Easy soap and water clean-up
- Water clean up
- Note: application of product on redwood and cedar will darken wood.
- Application of this product may produce strong, lingering odor
- Ready to Use
- Cunapsol Wood Preservative
- Approved for Outdoor Wood® Lifetime Warranty
- Wolmanized® Pressure-Treated Wood End Cut Solution
- Made in USA
- Printed in USA
- This product does not contain creosote.

1022-518

1/14/2002

1/7

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 14 2002

Ms. Gail Early
Registrations Representative
IBC MANUFACTURING COMPANY
416 East Brooks Road
Memphis, TN 38109

Subject: Revised Label
CUNAPSOL-1
EPA Registration Number 1022-518
Resubmission Dated December 14, 2001

Dear Ms. Early:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

A stamped copy is enclosed for your records.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or LaVerne Dobbins at (703) 308-6378.

Sincerely,



Adam Hayward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure:

CONCURRENCES							
SYMBOL	7510C						
SURNAME	LaVerne Dobbins						
DATE	1-14-02						

2/7

FINAL PRINTED LABEL

Cunapsol-1
Wood Preservative

FOR EXTERIOR USE ONLY

[Color statement(s)]
[Use statement(s)]
[Control statement(s)]
[Other statement(s)]

ACTIVE INGREDIENTS:

Copper Naphthenate	9.08%*
Inert Ingredients:	90.92%
Total:	100.00%

ACCEPTED

JAN 14 2002

*Equivalent to 1% metallic copper.

Cunapsol 1 weighs approximately 8.5 lbs. per gallon.

EPA Reg. No. 1022-518 EPA Est. No. 1022-TN-1

Volatile Organic Compounds <350 gm./liter.
VOS (excluding water) < 0.35 kg./liter

1022-518

**KEEP OUT OF REACH OF CHILDREN
DANGER**

See Back Panel for Precautionary Statements

Net Contents: 1 U.S. Quart (.9 Liters)
1 U.S. Gallon (3.785 Liters)
5 U.S. Gallons (18.925 Liters)

IBC Manufacturing Company
416 East Brooks Road
Memphis, Tennessee 38109
901-344-5350

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none">Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.Call a Poison Control Center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none">Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.Call a Poison Control Center or doctor for treatment advice.
In case of emergency, call Chemtrec at 1-800-424-9300. Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.	

3/7

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

Causes irreversible eye damage. Do not get in eyes, on skin or on clothing. Wear goggles or face shield. Harmful if inhaled. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before re-use. DO NOT breathe vapors or mist during brush, roll, spray and dip applications. Wear an NIOSH/MHSA-approved mist/vapor respirator when spraying for continued or prolonged use of this product or for frequent use of the product. In case of medical questions, emergencies or accidents involving this product, call Chemtrec at 1-800-424-9300. Application of this product may produce strong, lingering, unpleasant odor.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use only the application method specified for a particular use.

Cunapsol-1 Wood Preservative is a multi-purpose, EPA-registered, water-based exterior wood preservative and insecticide pre-treatment for below ground, ground contact, fresh water contact and above ground applications where either pressure-treated or non-pressure-treated wood has been used. When applied as directed, Cunapsol-1 provides protection against attack from termites and other wood boring insects and decay fungi, including mildew, mold, rot and decay organisms. It also controls warping, swelling and end checking due to its anti-wicking property, which resists moisture absorption and movement from end to end. This preservative will impart a color to wood that will fade over time, but if undesirable, can be top-coated with paint or stain.

Cunapsol-1 Wood Preservative requires no dilution before use. Use as received, following label directions.

Wood treated with this preservative should not be used where it may come in contact with food, feed or potable water.

RECOMMENDED USES: Landscape timbers, railroad ties, fence posts, poles, pickets and rails, construction posts, foundation sills, steps, stairs, porches, siding, millwork, shakes, shingles, roofs, windows, window frames, doors, docks, piers, boats or other non-pressure-treated exterior wood

4/7

exposed to moisture, weather or wood destroying insects. Also recommended for pressure-treated wood end cut protection, especially on decks.

Since Cunapsol-1 Wood Preservative has very low phytotoxicity, it can be used to treat wood for greenhouses, nursery flats, etc. Pretreatment only. Do not apply at sites on or near water or wetlands.

Powder post beetles which invade structural lumber are killed by application of this preservative. These insects will not attack the treated wood. Wood to be protected against subterranean termites should be treated before use in construction. Termites will not attack wood treated with this preservative.

In addition to preventing decay, blue stain, and insect attack on wood, Cunapsol-1 Wood Preservative controls warping, swelling, shrinking and end-checking caused by changes in moisture content of lumber and plywood products.

BEFORE YOU START: Make sure wood is dry and free of dust, dirt and debris. Stir or shake well before using. **IMPORTANT:** This product has a color that slowly fades with time, but can be stained or painted after 24 hours, or re-applied at any time. Always test in an inconspicuous area for color satisfaction.

APPLICATION PROCEDURES: For best results, apply when outside temperatures are between 50°F and 90°F, and when 24 hours of precipitation-free weather is expected. Apply by dip treatment, brush, roller or pump sprayer.

Below Ground, Ground or Fresh Water Contact:

Seasoned (weathered) or green (new) wood may be treated. Make certain the wood is free of bark, then immerse in Cunapsol-1 for 12 to 48 hours or until the sapwood is completely penetrated. If dipping is not possible, 2 brush coats, roller or spray applications should be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow wood to dry for 24 hours before installation.

Above Ground Contact:

The best results will be obtained if wood to be treated is immersed for 3 minutes or longer. If dipping is not possible, 2 brush coats, roller or spray applications should be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow 24 hours or longer after application of the preservative prior to installation, painting and/or staining.

COVERAGE: One gallon covers 100 – 300 sq ft (9 – 28 m²), depending upon the wood age and species, surface porosity and method of application. One quart covers 40 – 50 sq. ft. (4 – 5 m²).

CLEAN-UP: Clean tools and equipment after use with soap and water.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

STORAGE: Store in a secure, well-ventilated area protected from extreme temperatures. Do not transfer to unmarked containers. Keep container closed when not in use.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed

5/7

of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

GENERAL: Consult Federal, State or local disposal authorities for approved alternative procedures.

WARRANTY AND LIMITATION OF DAMAGES

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller this product conformed to its chemical description and that it was reasonably fit for the purposes stated on the product label when used both in accordance with the Direction for Use appearing on the product label and under normal conditions of use. Buyers and users of this product assume the risk of all loss or damage from use or handling of this product that results from their failure to read and comply with the Directions for Use of this product which appear on the product label. **SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO.** Unless expressly prohibited by state law, the liability of seller for any breach of warranty shall not exceed the purchase price of the product as to which a claim is made.

6/7

Label to include any of the following statements

(Color Statements)

- Green Wood Preservative
- Black Wood Preservative
- Brown Wood Preservative
- Cedartone Wood Preservative
- Imparts Green Color
- Imparts Black Color
- Imparts Brown Color
- Imparts Cedartone Color
- Imparts Long-Lasting, Black Color to Wood, Similar to Creosote
- Looks like Creosote
- With brown color additive
- Brown

(Use Statements)

- Above or Below Ground & Ground Contact
- Above or Below Ground, Ground and Water Contact
- Use above or below ground
- For wood in contact with soil and water
- Docks & Piers, Construction Posts, Fencing, and End Cuts
- End Cut Protection
- Ideal for End Cut Protection
- Landscape Ties, Fence Posts & Rails, and Construction Posts
- Construction Posts and Outdoor Decor
- Great for Small Projects
- Brush on preservative especially formulated for the coating of freshly sawn ends of pressure treated Outdoor wood.
- Cedar Shake Roof Preservative
- Ground Contact Preservative
- Decks
- Fences
- Shakes
- Shingles
- Roofs
- Posts
- Pressure-Treated Wood End Cut Protection
- Exterior
- This product is not designed for application on decks, outdoor furniture or other structures intended for seating or heavy foot traffic.

7/7

(Control Statements)

- Prolongs the life of non-pressure treated wood
- Prevents termite and other insect attack
- Protects against rot and decay
- Resists mold, mildew and stain fungi
- Anti-wicking – controls moisture damage
- Stops rot, decay and insect attack
- Protects against wood rot, warping swelling, termite damage, mildew and moisture
- Kills powder post beetles, termite attack above or below the ground
- Prevents decay, warping & swelling
- Preserves Wood
- Wood Preservative

(Other Statements)

- Paintable and Stainable
- Deep Penetrating formula
- Easy soap and water clean-up
- Water clean up
- Note: application of product on redwood and cedar will darken wood.
- Application of this product may produce strong, lingering odor
- Ready to Use
- Cunapsol Wood Preservative
- Approved for Outdoor Wood® Lifetime Warranty
- Wolmanized® Pressure-Treated Wood End Cut Solution
- Made in USA
- Printed in USA

1022-522

12/13/2004

Page 176

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 13, 2004

Gail Early
Registrations Representative
IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109Subject: Cunapsol - 5
EPA Registration Number 1022-522
Application Date: October 25, 2004
EPA Received Date: October 28, 2004

Dear Ms. Early:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

Proposed Amendment

- Revised labeling

Conditions

Revise the label as follows:

1. Revise the Precautionary Statements by adding the following statement:

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.
2. Revise the Environmental Hazards Statement by changing the statement "...public waters unless..." to read "...other waters unless..."

CONCURRENCES							
YMBOL	510C						
JRNAME	J. Early						
ATE							

286

Other Comments

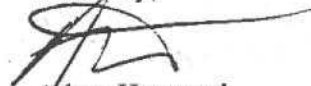
It is acceptable to separate the residential and industrial Storage and Disposal directions on the product's commercial label for marketing purposes.

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit three(3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)

CUNAPSOL-5 Wood Preservative

FOR EXTERIOR USE ONLY

Ingredient Statement

Active Ingredient:

Copper Naphthenate.....45.4%*

Inert Ingredients:54.6%

Total:100.0%

*Equivalent to 5% metallic copper

Cunapsol-5 weighs approximately 8.75 lbs. per gallon

EPA Reg. No. 1022-522

EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. • Call a Poison Control Center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 – 20 minutes. • Call a Poison Control Center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call a Poison Control Center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by a Poison Control Center or doctor. • Do not give anything by mouth to an unconscious person.
In case of emergency, call Chemtrec at 1-800-424-9300.	
Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.	

ACCEPTED
with COMMENTS
EPA Letter Dated:

Manufactured by:
IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109

DEC 13 2004

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1022-522

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS**DANGER**

Corrosive. Causes burns and irreversible eye damage. May be harmful if inhaled. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, protective clothing and rubber gloves. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

In case of medical questions, emergencies or accidents involving this product, call Chemtrec at 1-800-424-9300.

Application of this product may produce strong, lingering, unpleasant odor.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board of Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use only the application method specified for a particular use.

Products formulated or repackaged from this product must be labeled for "Exterior Use Only", and must bear all the statements listed under the section entitled Precautionary Statements and the formulator(s) or repackager(s) telephone number.

Cunapsol-5 is a concentrate and requires dilution with water before use. To treat wood for use in moderate decay hazard locations, dilute one volume of Cunapsol-5 with 4 volumes of water. To treat wood for use in high decay hazard locations, such as ground contact, dilute one volume of Cunapsol-5 with 1.5 volumes of water. It is intended for wood products that usually require painting or stenciling such as millwork and the like or in special situations to treat lumber for long storage in the open or in ground contact by simple non-pressure method.

PARTICLE BOARD

Cunapsol-5 is employed as a preservative for particle board, insulation board, and other wood base fiber and particle panel materials. In this use, Cunapsol-5 is mixed with furnish resin or binding agent at 1 to 3% based on dry weight of wood.

FOR TREATMENT BY DIP, ROLLER, BRUSH, AND SPRAYING**ABOVE-GROUND CONTACT**

The best results will be obtained if wood to be treated is immersed for 3 minutes or longer. If dipping is not possible, 2 brush coats, roller, or spray applications should be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow 24 hours or longer after application of the preservative prior to painting.

GROUND CONTACT

Seasoned or green wood may be treated. Make certain the wood is free of bark, then immerse in Cunapsol-5 for 12 to 48 hours or until the sapwood is completely penetrated.

COVERAGE: One gallon covers 100-300 sq. ft. depending upon the wood species, porosity of the wood, and method of application.

Water repellents may be admixed with Cunapsol-5 to improve dimensional stability of the treated wood. Colorants may be admixed for aesthetics and additional uv protection. This product is compatible and may be colored by the universal machine colorants employed to color oil or water-based paints. Note that colorants weather differently, and that color development varies with species, grain and wood undertone.

RECOMMENDED FOR

Cunapsol-5 is recommended for millwork windows, window frames, doors, siding, shakes & shingles, trellises fence pickets and rails, arbors and beverage cases. Original Equipment Manufacturers (OEM) may use this product on shakes and shingles prior to installation at domestic sites. Powder post beetles which invade structural lumber are killed by application of this preservative. These insects will not attack the treated wood.

Cunapsol-5 may also be used on fence posts, poles, foundation sills, decks, and all exterior wood exposed to moisture or weather prior to installation at domestic sites. Pretreatment only. Do not apply on or near water or wetlands.

Since Cunapsol-5 has very low phytotoxicity it can be used to treat wood for greenhouses, nursery flats, etc.

In addition to preventing decay, blue stain, and insect attack on wood, Cunapsol-5 controls warping, swelling, shrinking and end checking caused by changes in moisture content of lumber and plywood products.

Wood to be protected against subterranean termites should be treated before use in construction. Termites will not attack wood treated with Cunapsol-5 Wood Preservative.

Wood treated with Cunapsol-5 should not be used where it may come in contact with food, feed or potable water. See Technical Bulletin for additional uses.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store in a secure, well-ventilated area protected from extreme temperatures. Do not transfer to unmarked containers. Keep container closed when not in use.

DISPOSAL - COMMERCIAL / INDUSTRIAL:

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL: Consult Federal, State or Local disposal authorities for approved alternative procedures.

DISPOSAL - RESIDENTIAL / HOMEOWNER:

If Empty: Do not reuse this container. Place in trash or offer for recycling if available.

If Partially Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY AND LIMITATION OF DAMAGES

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller this product conformed to its chemical description and that it was reasonably fit for the purposes stated on the product label when used both in accordance with the Direction for Use appearing on the product label and under normal conditions of use. Buyers and users of this product assume the risk of all loss or damage from use or handling of this product that results from their failure to read and comply with the Directions for Use of this product which appear on the product label. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO. Unless expressly prohibited by state law, the liability of seller for any breach of warranty shall not exceed the purchase price of the product as to which a claim is made.